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**VIA ECF**

Honorable Steven L. Tiscione, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Paul T. Gioia v. Altice USA, Inc. et al., Case No.: 2:21- cv- 02193 (KAM)(ST)

Dear Magistrate Judge Tiscione:

This firm represents Defendants, Altice USA, Inc. and Patrick Xiques, in the above-referenced matter.

The Parties' deadline to complete fact discovery is currently February 25, 2022 [Dkt. No. 14]. Defendants are in the process of completing their ESI review and production to Plaintiff. In addition, there are outstanding discovery issues. The Parties would like to complete productions and resolve any discovery disputes before taking depositions, and some individuals to be deposed will be unavailable during certain weeks in February.

In light of these issues, the Parties respectfully request an extension of the February 25, 2022 discovery deadline until April 29, 2022 to allow adequate time to complete document production, resolve any issues, and take depositions. This is the parties' first request for an extension of the discovery deadline, it is requested jointly, in good faith, and not for the purpose of causing delay.

The parties thank the Court for its time and attention to this matter.

Respectfully submitted,

SEYFARTH SHAW LLP

*/s/ Cameron Smith*

Cameron Smith  
CS:ld